

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Felecia N. Harcum

Debtor

vs.

U.S. BANK NATIONAL ASSOCIATION (TRUSTEE
FOR THE PENNSYLVANIA HOUSING FINANCE
AGENCY)

Respondent

CHAPTER 13

CASE NO. 17-10177 MDC

**RESPONSE OF U.S. BANK NATIONAL ASSOCIATION (TRUSTEE FOR THE
PENNSYLVANIA HOUSING FINANCE AGENCY) TO DEBTOR'S
MOTION TO RECONSIDER ORDER MODIFYING AUTOMATIC STAY**

Respondent, U.S. BANK NATIONAL ASSOCIATION (TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY), by and through its counsel, KML Law Group, P.C., hereby responds to the Debtor's as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The averments of this paragraph reference a document, the truth and veracity of which speaks for itself. By way of further response, but not in derogation of the foregoing denial, the Stipulation approved by the Court on May 8, 2019 [Docket No. 47], required Debtor to file an Amended Plan incorporating the post-petition arrears as well as maintain regular monthly payments beginning with the payment of \$1,238.00 due April 1, 2019.
5. Denied. Debtor admits breaching the terms of the Court approved Stipulation in that no payments were received for the months of May, June, July or August 2019. Defendant further admits that alleged sum of \$6,319.52 was paid on September 19, 2019; ten (10) days after the Order for Relief from the Stay was entered.
6. Admitted.
7. Admitted.
8. Denied. After reasonable investigation, Respondent is without sufficient information to form a belief as to the veracity of the within averments. The same are therefore denied and strict proof thereof is demanded at trial.
9. Denied. After reasonable investigation, Respondent is without sufficient information to form a belief as to the veracity of the within averments. The same are therefore denied and strict proof thereof is demanded at trial.

WHEREFORE, Respondent, U.S. BANK NATIONAL ASSOCIATION (TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY), by and through its undersigned counsel, KML Law Group, P.C., respectfully requests that this Honorable Court Deny Debtor's Motion.

/s/ Kevin G. McDonald, Esquire

Kevin G. McDonald, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
(215) 627-1322
Attorney for Respondent

Date: November 5, 2019